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August 9, 2016

BY HAND AND ECF

Hon. Dora L. Irizarry, U.S.D.J.
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702 (DLI) (MDG)
Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914 (DLI) (MDG)
Weiss, et al. v. National Westminster Bank Plc, 05-cv-4622 (DLI) (MDG)
Applebaum, et al. v. National Westminster Bank Plc, 07-cv-916 (DLI) (MDG)

Dear Chief Judge Irizarry:

I write on behalf of all parties in the four above-captioned actions in response to the Court's Orders dated August 2, 2016, directing the parties to jointly submit proposed briefing schedules on three authorized motions: (i) by Crédit Lyonnais, S.A. ("CL"), Defendant in the Strauss and Wolf actions, for partial reconsideration of the Court's February 28, 2013 Opinion and Order in the Strauss and Wolf cases (the "CL Reconsideration Motion"); (ii) by CL for summary judgment on claims of reinstated plaintiffs in the Strauss and Wolf cases (the "CL Reinstated Claims Motion"); and (iii) by National Westminster Bank Plc ("NatWest"), Defendant in the Weiss and Applebaum actions, for summary judgment on two issues not reached by the Court in its March 28, 2013 Opinion and Order in the Weiss and Applebaum cases, and for summary judgment on claims of plaintiffs recently added in the Weiss and Applebaum cases (the "NatWest Combined Motion").

The parties have agreed, subject to the Court's approval, to the following briefing schedule for these three motions:

Hon. Dora L. Irizarry, U.S.D.J., p. 2

CL Reconsideration Motion:

September 26:	CL serves opening brief
October 31:	Plaintiffs serve opposition brief
December 2:	CL serves reply (and files the "bundle")

CL Reinstated Claims Motion:

Briefing to run concurrently with the CL Reconsideration Motion.

NatWest Combined Motion:

December 21:	NatWest serves opening brief
January 25, 2017:	Plaintiffs serve opposition brief
February 24:	NatWest serves reply (and files the "bundle")

We are available should Your Honor have any questions or concerns relating to this proposal.

Respectfully,

A handwritten signature in black ink, appearing to read "Lawrence B. Friedman", with a long horizontal flourish extending to the right.

Lawrence B. Friedman

cc: All counsel of record